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THE LAW OFFICES OF

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Via ECF

Honorable Colleen McMahon, U.S.D.J. Daniel Patrick Moynihan United States Courthouse 500 Pearl Street - Courtroom 24A New York, NY 10007-1312 (212) 805-6325

March 6, 2023

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Brown v. NYC DOE, et al. Re: Case Number: 1:20-cv-10948-CM

Dear Judge McMahon:

We represent the Plaintiff, Marina Brown, in the above-referenced action. We write today jointly with counsel for Defendants.

Specifically, we write further to the Court's directive that we provide updates every ninety (90) days as to the status of the State Court action. In that regard, please be advised that the State Court has rendered a decision denying in part and granting in part Defendants' Motion to Dismiss. The Defendants' Answer is currently due to be served on or before April 26, 2023. and the Parties are currently discussing a potential resolution to both actions. Thus, the parties respectfully request that the Court extend this case's stay until June 1, 2023 to give the Parties an opportunity to settle.

We thank the Court for its time, attention, and courtesies in this regard.

Respectfully submitted,

Ethan Leonard (EL2497)

Cc: Kami Z. Barker (Via ECF and Electronic Mail on consent)